

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



February 1, 2013

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Military Order of the Carabao Dinner on February 2, 2013

On the evening of February 2, 2013, the Military Order of the Carabao, a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a black tie event at the Gaylord National Resort and Convention Center in National Harbor, Maryland.

Founded in 1900, the Military Order of the Carabao advances camaraderie among members of the armed forces. The event, which honors all those who serve in the U.S. armed forces, includes a reception, dinner, and show, in addition to the presentation of the Order's Distinguished Service Award.

Approximately 1500 people have been invited to attend, including representatives from the legislative branch, the military, and the Federal executive branch. Attendees include members of the public from a wide variety of sectors who participate in the Order. The estimated cost of the event, including all food and beverages, is \$250 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding NASA programs and policies with guests from various roles in the private sector, government and other areas who are interested in important national objectives. Accordingly, NASA employees – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – whose duties do not substantially affect the sponsors may accept an invitation for free attendance to the event.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone